

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

JANE DOE,

Plaintiff,

v.

THE CITY OF GAULEY BRIDGE and
LARRY ALLEN CLAY, JR.,
individually as a member of the Gauley
Bridge Police Department,

Defendants.

Civil Action No. 2:21-cv-00491
The Honorable Chief Judge Johnston

**PLAINTIFF’S RENEWED MOTION FOR LEAVE TO DEPOSE INCARCERATED
INDIVIDUALS**

NOW COMES, Plaintiff Jane Doe (“Plaintiff”), by counsel, and, pursuant to Fed. R. Civ. P. 30(a)(2)(B), moves the Court to depose certain incarcerated individuals as follows:

1. Defendant Larry Allen Clay, Jr. (“Chief Clay”), Kristen Naylor-Legg (“Ms. Naylor-Legg”), and Christopher Osborne (“Mr. Osborne”) have all been named in Rule 26(a)(1) disclosures as individuals with knowledge or are otherwise believed to have discoverable information about this matter.

2. Upon information and belief, Chief Clay is currently incarcerated at the Carter County Detention Center in Grayson, Kentucky.

3. Upon information and belief, Ms. Naylor-Legg is currently incarcerated at South Central Regional Jail in Charleston, West Virginia.

4. Upon information and belief, Mr. Osborne is currently incarcerated at the Boyd County Detention Center in Catlettsburg, Kentucky.

5. Pursuant to Fed. R. Civ. P. 30(a)(2)(B), an incarcerated individual cannot be deposed without leave of the Court.

WHEREFORE, Plaintiff moves this Court for leave to depose Defendant Larry Allen Clay, Jr., Kristen Naylor-Legg, and Chirstopher Osborne, all incarcerated individuals.

**JANE DOE,
By Counsel**

/s/ Russell A. Williams

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CERTIFICATE OF SERVICE

The undersigned counsel for Plaintiff hereby certifies that a true and correct copy of the foregoing *PLAINTIFF'S MOTION FOR LEAVE TO DEPOSE INCARCERATED INDIVIDUALS* was filed with the clerk on June 22, 2022 via the Court's CM-ECF Filing System which will provide electronic notification to all counsel of record.

/s/ Russell A. Williams

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